

Kamke, Sherry

From: Kamke, Sherry
Sent: Tuesday, May 17, 2016 7:35 PM
To: Dunn, Greg
Subject: Wedron

Greg,

Hi. I am wondering if you have a sense of how much the Wedron pump test would cost to perform. Could you let me know.

Sherry



125 South Wacker Drive, Suite 600
Chicago, Illinois 60606
Telephone: +1 312 346-5000
Facsimile: +1 312 346-5228

April 27, 2016

Mr. Eric Kuhlman
Illinois Environmental Protection Agency
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 62794-9276

Subject: LPC #0998995017 - LaSalle County
Wedron/Illinois Railway - Right-of-Way
LUST Incident No. 20130463

Dear Mr. Kuhlman:

CDM Smith Inc. (CDM Smith) is submitting this letter in order to clarify comments posed by the Illinois Environmental Protection Agency (IEPA) and United States Environmental Protection Agency (USEPA) on our proposed work plan as submitted February 11, 2016.

1C. IEPA/USEPA Comment: The Scope of Work indicates two monitoring wells are to be installed to monitor different depths, or zones, of the aquifer system. The deeper of the two wells is intended to monitor a lower water-bearing zone, known to have regional BTEX contamination. Subsequent sections of the work plan indicate the two monitoring well screens are to intersect (straddle) the water table. If the two wells are to be "different", they should not both monitor the same aquifer zone and the work plan should be revised to reflect this.

1R. Response:

The intent of the two monitoring wells is to sample two separate zones, the shallow or perched groundwater encountered 10-15 feet below ground surface as well as the groundwater encountered within the St. Peter's Sandstone at 25-30 feet bgs. The shallow saturated soil observed in this area is more likely associated with storm water runoff at this location and the intent of locating and characterizing water in a shallow saturated zone is to better define subsurface water movement in this specific area.

2C. IEPA/USEPA Comment: The lower water-bearing zone, noted to be regionally impacted with BTEX, is interpreted to include the St. Peter Sandstone; therefore, the deeper monitoring well be installed into the St. Peter Sandstone to provide the best representation of this aquifer system in this area. A direct-push drill rig will not be capable of installing a monitoring well into the St. Peter Sandstone, and a hollow-stem auger drill rig should be used for this purpose. The St. Peter Sandstone should be drilled using a tri-cone, or equivalent, bit. Experience using solely



Mr. Eric Kuhlman
April 27, 2016
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augers through the sandstone has resulted in excessive turbidity due to "rock flour" remaining in the well, and should not be the proposed drilling method through the St. Peter Sandstone.

2R. Response:

The monitoring wells will be installed with a hollow stem auger as indicated in the work plan, not a direct push rig. A tri-cone or equivalent bit will be used to drill 5-6 feet into the St. Peter's Sandstone.

3C. IEPA/USEPA Comment: The Work Plan indicates "multiple soil samples will be collected for analysis based on PID readings and past findings". No further detail is provided to explain the conditions which trigger sample collection. Provide details regarding a PID limit above which a sample will be collected and define the minimum, and perhaps the maximum, number of samples to be collected at each soil boring.

3R. Response:

One sample will be collected within each four-foot vertical soil interval and screened with a PID to document any indications of volatile organic compounds. Each sample will be submitted to the laboratory for immediate analyses for BTEX and naphthalene, the only contaminant detections from the previous samples. This will allow us to characterize the vertical soil profile from surface to smear zone.

4C. IEPA/USEPA Comment: Similar to the above comment, it is unclear what the conditions will be in order to collect an additional sample and place it on hold. The Work Plan should elaborate to provide greater detail.

4R. Response:

See 3R. Response.

5C. IEPA/USEPA Comment: CDM should provide some justification for the locations if there has been some change from what they originally had discussed with IEPA. The plan is lacking in detail.

5R. Response:

The sample locations as indicated on the sample location map were as discussed with the IEPA due to the presence of the rip-rap. However, CDM Smith will work with the driller to either clear the rip-rap or otherwise complete the borings and monitoring wells west of the west wall of the former UST excavation area.

6C. IEPA/USEPA Comment: As you may recall, I believe only one (1) monitoring is required in a location west of the former UST and before the roadway. It's a much better location to collect soil and groundwater samples in order to determine the full extent of the contamination west of the former UST location. However, due to the nature of this site, it may be prudent to collect soil



Mr. Eric Kuhlman
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samples within every 5-foot interval regardless of any perched groundwater encountered to determine the extent of the vertical contamination before reaching bedrock at approximately 18-20 feet below surface grade.

6R. Response:

Two monitoring wells will be installed west of the former UST as indicated in the 1R. Response. Samples will be collected within each four-foot vertical soil interval.

These revisions address IEPA's and US EPA's recent comments. Please confirm that the work plan comments have been adequately addressed so we can schedule the fieldwork in a timely fashion.

Please contact the undersigned with any questions or comments.

Very truly yours,

A handwritten signature in cursive script that reads "Christopher A. Albrecht".

Christopher A. Albrecht
Senior Project Manager
CDM Smith Inc.

AlbrechtCA@cdmsmith.com
(312) 780-7743

Egan, Robert

From: Egan, Robert
Sent: Thursday, March 17, 2016 1:43 PM
To: Clark, Jacqueline
Cc: Faryan, Steve; Kamke, Sherry; Cisneros, Arturo
Subject: RE: LPC #0998995017 - LaSalle County

Hi Jacquie,

I took a look at the work plan and I do not have any comments beyond those offered by Andris and the concerns about drilling locations from IEPA. CDM should provide some justification for the locations if there has been some change from what they originally had discussed with IEPA. The plan is lacking in detail.

Bob Egan
Corrective Action Manager
Underground Storage Tanks Section
RCRA Branch
EPA Region 5
(312) 886-6212
(312) 692-2911 (fax)

From: Clark, Jacqueline
Sent: Thursday, March 17, 2016 12:04 PM
To: Faryan, Steve <faryan.steven@epa.gov>; Egan, Robert <egan.robert@epa.gov>; Kamke, Sherry <Kamke.Sherry@epa.gov>; Cisneros, Arturo <cisneros.arturo@epa.gov>; Shoven, Heather <shoven.heather@epa.gov>; Bussey, Donald <Bussey.Don@epa.gov>; Poy, Thomas <poy.thomas@epa.gov>; Rudloff, Gregory <rudloff.gregory@epa.gov>
Cc: Kenney, Thomas <kenney.thomas@epa.gov>
Subject: FW: LPC #0998995017 - LaSalle County
Importance: High

Hi Team – see the message below from IEPA. Steve and I received comments from Andris (Weston) earlier this week, which I will forward. Does anyone else anticipate comments on IR's workplan (attached)?

Jacqueline Clark

Associate Regional Counsel
U.S. EPA, Region 5 (C-14J)
77 W. Jackson Blvd.
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From: Kuhlman, Eric [<mailto:Eric.Kuhlman@Illinois.gov>]
Sent: Thursday, March 17, 2016 9:33 AM

To: Albrecht, Chris <AlbrechtCA@cdmsmith.com>
Cc: Guy, Jeff <Jeff.Guy@Illinois.gov>; Clark, Jacqueline <clark.jacqueline@epa.gov>
Subject: RE: LPC #0998995017 - LaSalle County

I'll see what I can do, but right now I'm waiting for comments from the USEPA.

But I thought we talked about advancing one (1) boring west of the former 500-gallon UST, instead of the two borings proposed in locations north and south of where we discussed. I understand this rip-rap is in the location that I want to advance a soil boring, so I have a few questions: Can the rip-rap be removed? And have you considered angular drilling?

From: Albrecht, Chris [mailto:AlbrechtCA@cdmsmith.com]
Sent: Thursday, March 17, 2016 8:28 AM
To: Kuhlman, Eric
Subject: RE: LPC #0998995017 - LaSalle County

Eric – we have an opportunity to complete the fieldwork the week of May 28th (driller availability and field tech). Is it possible to get your approval early next week so we can plan accordingly?

Thank you

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com

From: Kuhlman, Eric [mailto:Eric.Kuhlman@Illinois.gov]
Sent: Thursday, March 10, 2016 11:28 AM
To: Albrecht, Chris <AlbrechtCA@cdmsmith.com>
Subject: RE: LPC #0998995017 - LaSalle County

Two weeks.

From: Albrecht, Chris [mailto:AlbrechtCA@cdmsmith.com]
Sent: Wednesday, March 09, 2016 3:04 PM
To: Kuhlman, Eric
Subject: RE: LPC #0998995017 - LaSalle County

Eric – my client has asked about the time frame for approval as they want to get this scheduled as soon as possible.

thanks

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com

From: Albrecht, Chris
Sent: Thursday, March 03, 2016 4:11 PM
To: 'Kuhlman, Eric' <Eric.Kuhlman@Illinois.gov>
Subject: RE: LPC #0998995017 - LaSalle County

Here you go. Please call me if you have any questions. Also, if you could, let me know an estimated time frame for your approval.

thanks

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From: Kuhlman, Eric [<mailto:Eric.Kuhlman@Illinois.gov>]
Sent: Thursday, March 03, 2016 3:40 PM
To: Albrecht, Chris <AlbrechtCA@cdmsmith.com>
Subject: RE: LPC #0998995017 - LaSalle County

No, I haven't had time to look at it, but while we're on the subject. Could you send me another copy via email?

From: Albrecht, Chris [<mailto:AlbrechtCA@cdmsmith.com>]
Sent: Thursday, March 03, 2016 10:45 AM
To: Kuhlman, Eric
Subject: RE: LPC #0998995017 - LaSalle County

Eric – we recently submitted a work plan to you for review prior to initiating additional work on the Wedron, IL site. Have you had time to review our proposed work? We are in the process of scheduling work for the upcoming weeks and would like to get the fieldwork scheduled.

thanks

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Kamke, Sherry

From: Kamke, Sherry
Sent: Thursday, March 17, 2016 12:22 PM
To: Egan, Robert
Subject: FW: LPC #0998995017 - LaSalle County
Attachments: Ltr to E. Kuhlman, IL EPA 2-10-16.pdf; WEDRON WORKPLAN 021116.pdf

Importance: High

Bob,

Will you have a chance to take a look at the IR workplan? It is 5 pages.

From: Clark, Jacqueline
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To: Faryan, Steve <faryan.steven@epa.gov>; Egan, Robert <egan.robert@epa.gov>; Kamke, Sherry <Kamke.Sherry@epa.gov>; Cisneros, Arturo <cisneros.arturo@epa.gov>; Shoven, Heather <shoven.heather@epa.gov>; Bussey, Donald <Bussey.Don@epa.gov>; Poy, Thomas <poy.thomas@epa.gov>; Rudloff, Gregory <rudloff.gregory@epa.gov>
Cc: Kenney, Thomas <kenney.thomas@epa.gov>
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Jacqueline Clark

Associate Regional Counsel
U.S. EPA, Region 5 (C-14J)
77 W. Jackson Blvd.
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advance a soil boring, so I have a few questions: Can the rip-rap be removed? And have you considered angular drilling?

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February 11, 2016

Mr. Eric Kuhlman
Illinois Environmental Protection Agency
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 62794-9276

Subject: LPC #0998995017 – LaSalle County
Wedron/Illinois Railway – Right-of-Way
LUST Incident No. 20130463

Dear Mr. Kuhlman:

CDM Smith Inc. (CDM Smith) submits this work plan to the Illinois Environmental Protection Agency (IEPA) to conduct an additional subsurface investigation on the railroad right-of-way located in Wedron, Illinois based on your letter dated January 19, 2016 and a subsequent conference call on February 2, 2016.

Project Background

The subject property is a railroad easement located on the east side of Wedron, Illinois along County Highway 11. Erosion of the railroad embankment in April 2013 uncovered an abandoned 500-gallon UST near the intersection of County Highway 21 and County Highway 11. The OSFM determined that there was a release and the site was issued LUST No. 20130463. The early remedial actions consisted of the removal of approximately 200 gallons of liquid from the tank system, the excavation and off-site disposal of the 500-gallon tank, the removal and off-site disposal of approximately 30 cubic yards of petroleum-contaminated soils, the collection of confirmation soil samples from both the excavation floor and sidewalls, and backfilling of the excavation with clean fill material. In addition to placement of fill material, Illinois Railway also placed erosion control rip rap in the former excavation area, as a means to reduce future storm water runoff erosion of the embankment.

Further excavation of impacted soil was limited due to the proximity of the Illinois ROW property line and the adjacent roadway. Confirmatory samples indicated the west wall exceeded the SROs for the soil component of groundwater ingestion exposure route for benzene and ethylbenzene. Naphthalene exceeded the construction worker Inhalation SRO. Observations of the UST removal and soil excavation did not indicate free product or gross contamination of the soil.



Mr. Eric Kuhlman
February 11, 2016
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Scope of Work

During the conference call with the IEPA on February 2, 2016, it was discussed that additional subsurface data would need to be collected from within the immediate vicinity of UST#2 in order for the IEPA to consider the open LUST incident for closure.

During the call, drilling one (1) boring/monitoring well in the area of approximately 8-foot distance between the property boundary and former UST#2 location was discussed. Upon further review, CDM Smith proposes to drill and install two (2) monitoring wells in this immediate area (see Figure 1). One monitoring will be completed within a shallow screened interval in order to collect any perched groundwater from directly below the former UST#2 site. The second monitoring well will be drilled deeper and the well screen will be installed in the lower water-bearing zone, which is known to have regional BTEX contamination. Soils will be screened continuously and multiple soil samples will be collected to further document any soil contamination specific to the UST#2 operations as well as the known regional impacts at depth in the capillary fringe zone.

CDM Smith will work with the IEPA to agree on the placement of the borings/monitoring wells as identified above. The borings/monitoring wells will be utilized to characterize the fill and subsurface materials and help IEPA understand the "micro" environmental model of UST#2 site. See Figure 1 that shows the targeted general locations of the proposed groundwater monitoring wells.

Task 1 – Field Investigation

Utility location - Public utilities will be notified using the Illinois Joint Utility Locating Information for Excavators (JULIE) utility locating services 48 hours prior to drilling.

Drill and collect samples - CDM Smith will direct the drilling subcontractor to advance two (2) soil borings using direct push technology, one (1) shallow (10-15 feet) and one (1) to bedrock at the locations approved by the IEPA. CDM Smith proposes to locate the borings as close as practical to the former excavation area's west side; however, since this location is a stormwater drainage area covered with rip rap, we may have to move the boring north or south of the intended locations.

An engineer/geologist will classify soils according to the Unified Soil Classification System (USCS), note visual evidence of contamination and/or odors, and screen soils with a PID for volatile organic compounds. Soils will be classified on a continuous basis from the surface to the terminus of the boring.

Multiple soil samples will be collected for analysis based on PID readings and the past findings from borings in the vicinity of the UST. No soil samples will be collected below the water table. The soil samples will be placed in the appropriate containers provided by the laboratory, logged,



Mr. Eric Kuhlman
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properly labeled, placed in iced coolers, and sent to the analytical laboratory using standard chain-of-custody procedures.

Install and Develop Monitoring Wells - CDM Smith will complete two (2) monitoring wells within the completed soil borings using a hollow-stem auger (HSA). The well construction will consist of 2-inch diameter PVC pipe with a ten (10) foot section of 0.010-inch slotted screen placed across the water table. The well will include flush-mounted covers and locking well caps and will be surveyed to the top of the casing using the established datum.

CDM Smith will develop the monitoring wells using a surge and pump technique to remove silt and other fines from the screened interval and to improve the hydraulic connection between the well and the surrounding formation.

Sample Monitoring Wells and Collect Water Level Measurements - CDM Smith will collect one (1) round of groundwater samples. Sampling will be conducted using low-flow methodologies.

Analytical - Soil and groundwater samples will be analyzed for BTEX and PNAs. Additional samples collected in the field can be placed on hold pending review of the initial analytical results.

Laboratory analytical services will be provided by Test America of University Park, Illinois. Test America is accredited by the National Environmental Laboratory Accreditation Program (NELAP). Laboratory procedures and methods will meet the minimum specified detection limits in accordance with the IEPA TACO: 35 IAC Part 742 and/or SW-846 protocols. CDM Smith assumes samples will be analyzed under a standard (10-day) turnaround time.

CDM Smith will also gauge depth to groundwater for the new well and the four (4) existing wells using the established datum for the Wedron groundwater investigation activities.

Field Assumptions

- CDM Smith assumes that all work will be conducted within the IR property limits.
- CDM Smith will attempt to locate the proposed borings/monitoring wells as close to the former UST#2 excavation west wall as feasible.
- The monitoring wells will be completed such that the screen straddles the water table.

Task 2 – Site Investigation Completion Report

CDM Smith will prepare a revised Site Investigation Completion report (SICR) summarizing the results of the subsurface investigation as well as providing historical documentation related to the UST #2 area. The SICR will include the following at a minimum:

- Site history with respect to the release;
- Site description, including:



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- Area
- Geology, hydrogeology, and hydrology
- geography and topography
- mitigation pathways and exposure routes
- land use
- Site Investigation results, including:
 - maps showing borings and monitoring wells, including those related to the adjacent Hoxsey property
 - horizontal extent of contamination
 - cross section showing the horizontal and vertical extent of contamination;
 - Soil boring logs and monitoring well diagrams
 - Analytical results, chain of custody forms, and laboratory certifications;
 - A table comparing detected chemicals to proposed TACO Tier 1 remediation objectives (ROs) contained in 35 IAC Part 742;
 - Potable water supply well survey
- Conclusion that includes an assessment of the sufficiency of the data
- Site maps meeting the requirements of 35 IAC 734.440

Project Schedule

Task 1 – The field investigation will be initiated within 4 weeks of IEPA approval of the work plan.

Task 2 - A draft SICR will be completed within 2 weeks of receipt of the soil and groundwater laboratory analyses.

Please contact the undersigned with any questions or comments.

Very truly yours,

Christopher A. Albrecht
Senior Project Manager
CDM Smith Inc.

AlbrechtCA@cdmsmith.com
(312) 780-7743

Randall T. Smith
Vice President
CDM Smith Inc.

SmithRT@cdmsmith.com
(415) 495-6201 x206

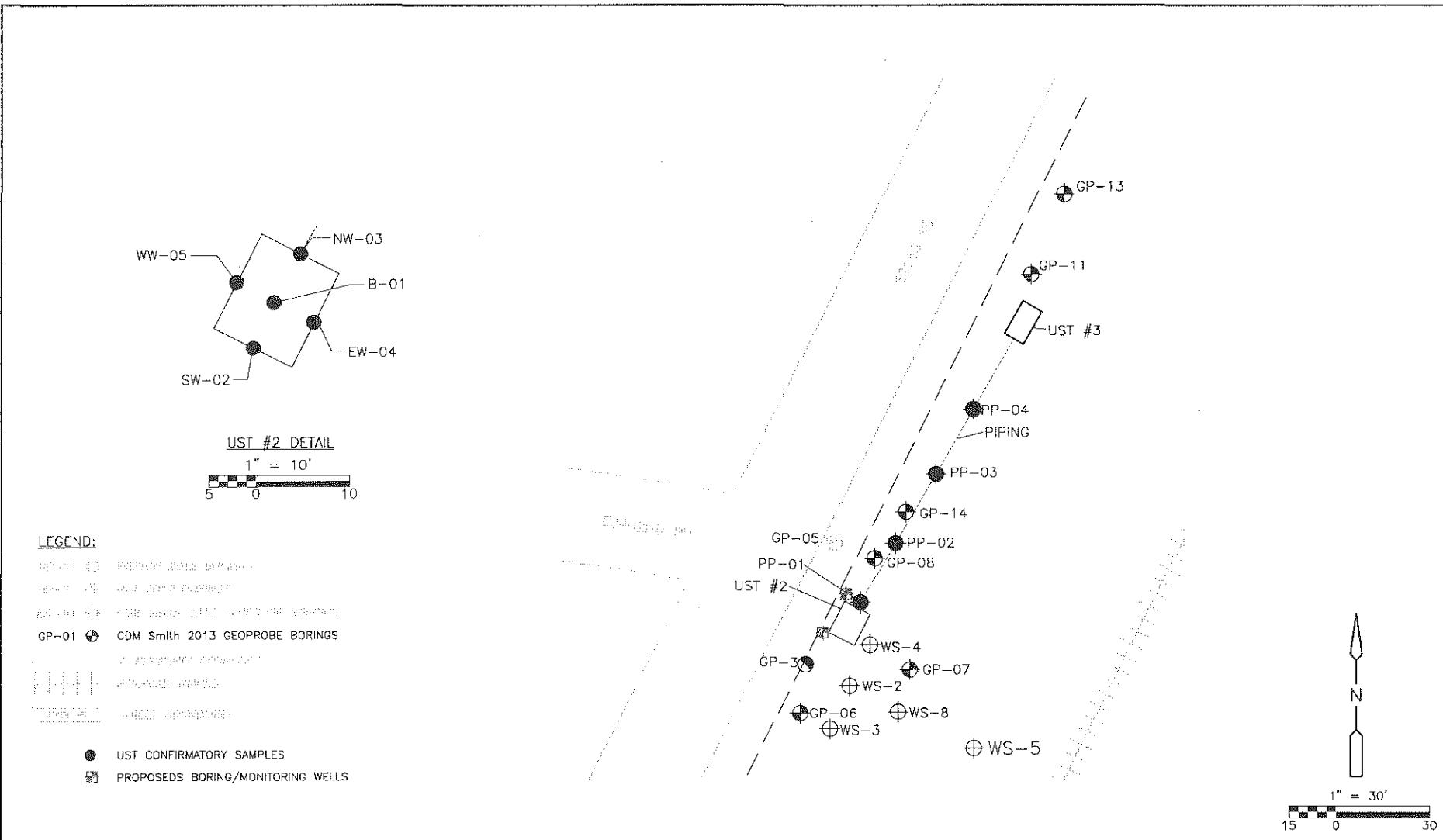
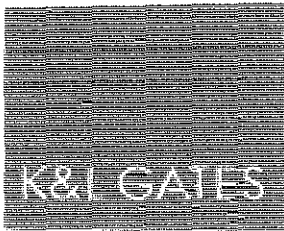


FIGURE 1
PROPOSED BORING/MONITORING WELL LOCATION
ILLINOIS RAILWAY
WEDRON, IL



K&L GATES LLP

70 W. MADISON ST.

SUITE 3100

CHICAGO, IL 60602

T +1 312 372 1121 F +1 312 827 8000 klgates.com

By Email and US Mail

Mr. Eric Kuhlman
Leaking underground Storage Tank Section
Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 62794-9276

David Rieser
david.rieser@klgates.com

T +1 312 807 4359

February 10, 2016

Re: LPC #0998995017 - LaSalle County
Wedron/Illinois Railway - Right of Way
LUST Incident No. 20130463

Dear Mr. Kuhlman:

Enclosed please find a Work Plan to conduct additional subsurface investigations at the above site. Please be advised that in submitting this work plan, Illinois Railway does not waive any of its rights to claim that the IEPA lacks authority to require investigation or corrective action regarding this UST. IEPA determined that the UST which was the subject of this incident was taken out of operation prior to 1974 and not subject to corrective action requirements under the Illinois Environmental Protection Act. In the July 8, 2013 letter, IEPA acknowledged that the UST was not subject to mandatory corrective action under the UST program. Despite this determination, in letters dated August 7, 2013 and May 26, 2015 IEPA requested that the property owner, Illinois Railway, submit a SICR. Illinois Railway submitted a SICR dated September 22, 2015 in the interest of cooperating with the IEPA but noted that it had no legal requirement to do so. Similarly, Illinois Railway submits this Work Plan to respond to IEPA's comments in their letter dated January 19, 2016 in a spirit of cooperation but not legal obligation.

As the IEPA has previously determined, this UST is not subject to mandatory corrective action. Illinois Railway is submitting this Work Plan without waiving any argument that IEPA has no authority to require further investigation or corrective action regarding this UST.

Sincerely,



David Rieser

Attachment

cc: James Richardson
Ken Rose

Cisneros, Arturo

From: Dunn, Greg <Greg.Dunn@Illinois.gov>
Sent: Tuesday, January 26, 2016 1:35 PM
To: Cisneros, Arturo
Cc: Kamke, Sherry; Lowder, Neelu; Guy, Jeff; Faryan, Steve
Subject: RE: Status of Wedron/Hoxsey pump test

Arturo,

USGS is compiling information for LaSalle County, Illinois on water resources for the county and the effects of mining on the St. Peter Sandstone. They believe the information from the Wedron pump test will add information to their study on the effect of high capacity wells and the water quality of the sandstone by those wells. USGS is currently working with USEPA on using the geophysical drill rig to log at least the pumping well, but also would like to log the three other wells to be drilled into the New Richmond. However, if they will interfere with our work they would not do the logging. We think we can work with them and our contractor will discuss the logging of our wells with USGS. The logging of these wells by USEPA/USGS will not interfere with our data and the work on-going by USGS will also not interfere. I believe Bob Kay from USGS has already reached out to Steve Faryan about the use of the USEPA geophysical rig.

If you have any additional questions, please let me know.

Greg

From: Cisneros, Arturo [mailto:cisneros.arturo@epa.gov]
Sent: Wednesday, January 20, 2016 2:31 PM
To: Dunn, Greg
Cc: Kamke, Sherry; Egan, Robert; Lowder, Neelu; Guy, Jeff; Egan, Robert; Clark, Jacqueline; Bussey, Donald; Faryan, Steve
Subject: RE: Status of Wedron/Hoxsey pump test

Hi Greg,

Thank you for the update. I forwarded this information to members of the EPA Wedron team and they were wondering if you can provide us more information on the USGS study. We were particularly concerned that whatever data USGS wants, it does not interfere with the data that EPA needs for our future remedial decisions. For this reason, could you please include Steve Faryan and Don Bussey in future discussions with USGS? Thank you.

Arturo

Arturo Cisneros

U.S. EPA - Region 5
77 W. Jackson Blvd. (LR-8J)
Chicago, IL 60604
Ph: 312-886-7447
Fax: 312-697-2088

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Sent: Wednesday, January 20, 2016 1:01 PM
To: Cisneros, Arturo <cisneros.arturo@epa.gov>
Cc: Kamke, Sherry <Kamke.Sherry@epa.gov>; Egan, Robert <egan.robert@epa.gov>; Lowder, Neelu <Neelu.Lowder@Illinois.gov>; Guy, Jeff <Jeff.Guy@Illinois.gov>
Subject: RE: Status of Wedron/Hoxsey pump test

Arturo,

We are finalizing the contract language and hope to send the contract to the contractor soon. We have been talking with Ted Pumo of the LaSalle County Health Department about receiving a variance from the county to allow the pump test (they have a moratorium on high capacity wells and they consider this test a high capacity well). The USGS has also talked with the county and since this test would help the USGS in their study for the county, we hope we can come to a solution soon. If everything goes smoothly, we hope to be out in the field in the next few months.

Greg

Gregory W. Dunn, Acting Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

Phone (217) 785-2359
Fax (217) 782-9308

E-mail: Greg.Dunn@illinois.gov

From: Cisneros, Arturo [<mailto:cisneros.arturo@epa.gov>]
Sent: Wednesday, January 20, 2016 11:25 AM
To: Dunn, Greg
Cc: Kamke, Sherry; Egan, Robert
Subject: Status of Wedron/Hoxsey pump test

Hi Greg,

Just checking to see if there has been any progress/update for the Hoxsey pump test at Wedron. I know Joyce mentioned a possible January start date but we were not sure if there was any delay due to contractual, budget or other issues. Thank you.

Arturo

Arturo Cisneros
U.S. EPA - Region 5
77 W. Jackson Blvd. (LR-8J)
Chicago, IL 60604
Ph: 312-886-7447
Fax: 312-697-2088

Cisneros, Arturo

From: Dunn, Greg <Greg.Dunn@Illinois.gov>
Sent: Wednesday, January 20, 2016 1:01 PM
To: Cisneros, Arturo
Cc: Kamke, Sherry; Egan, Robert; Lowder, Neelu; Guy, Jeff
Subject: RE: Status of Wedron/Hoxsey pump test

Arturo,

We are finalizing the contract language and hope to send the contract to the contractor soon. We have been talking with Ted Pumo of the LaSalle County Health Department about receiving a variance from the county to allow the pump test (they have a moratorium on high capacity wells and they consider this test a high capacity well). The USGS has also talked with the county and since this test would help the USGS in their study for the county, we hope we can come to a solution soon. If everything goes smoothly, we hope to be out in the field in the next few months.

Greg

Gregory W. Dunn, Acting Manager
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Phone (217) 785-2359
Fax (217) 782-9308

E-mail: Greg.Dunn@illinois.gov

From: Cisneros, Arturo [mailto:cisneros.arturo@epa.gov]
Sent: Wednesday, January 20, 2016 11:25 AM
To: Dunn, Greg
Cc: Kamke, Sherry; Egan, Robert
Subject: Status of Wedron/Hoxsey pump test

Hi Greg,

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Arturo

Arturo Cisneros
U.S. EPA - Region 5
77 W. Jackson Blvd. (LR-8J)
Chicago, IL 60604
Ph: 312-886-7447

Fax: 312-697-2088

Kamke, Sherry

From: Kamke, Sherry
Sent: Friday, September 25, 2015 1:59 PM
To: Cisneros, Arturo
Subject: RE: Wedron Silica Company - Corrective Action Completion Report - Denial Letter

Bob is on travel. He may be able to look at this email later today when he arrives back home. He will be back working flexiplace on Monday.

From: Cisneros, Arturo
Sent: Friday, September 25, 2015 12:33 PM
To: Kamke, Sherry
Subject: FW: Wedron Silica Company - Corrective Action Completion Report - Denial Letter

FYI

I sent Bob a message about this just this past Wednesday but did not hear from him. Not sure if he is on travel.

AC

From: Cisneros, Arturo
Sent: Friday, September 25, 2015 12:30 PM
To: 'Donnelly, Jason'; Egan, Robert
Subject: RE: Wedron Silica Company - Corrective Action Completion Report - Denial Letter

I Jason. I had no comments and thought your comments were good. However, I am not the corrective action person for our UST Section and will defer to Bob. Hopefully he will get a response to you soon. Thanks

Arturo

Arturo Cisneros
U.S. EPA - Region 5
77 W. Jackson Blvd. (LR-8J)
Chicago, IL 60604
Ph: 312-886-7447
Fax: 312-697-2088

From: Donnelly, Jason [<mailto:Jason.Donnelly@Illinois.gov>]
Sent: Friday, September 25, 2015 9:08 AM
To: Egan, Robert
Cc: Cisneros, Arturo
Subject: RE: Wedron Silica Company - Corrective Action Completion Report - Denial Letter

Good Morning...

Checking in to see if there were any comments from the EPA.

Jason Donnelly

Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
Phone: (217) 557-8764
Fax: (217) 524-4193
Jason.Donnelly@illinois.gov

From: Donnelly, Jason
Sent: Wednesday, September 09, 2015 8:13 AM
To: Egan, Robert
Cc: 'Cisneros, Arturo'
Subject: FW: Wedron Silica Company - Corrective Action Completion Report - Denial Letter

I guess it would help if I actually attached the letter...sorry.

Jason

Jason Donnelly

Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
Phone: (217) 557-8764
Fax: (217) 524-4193
Jason.Donnelly@illinois.gov

From: Donnelly, Jason
Sent: Wednesday, September 09, 2015 7:53 AM
To: Egan, Robert
Cc: 'Cisneros, Arturo'
Subject: Wedron Silica Company - Corrective Action Completion Report - Denial Letter

Bob,

Attached is a copy of my denial letter for the Corrective Action Completion Report, which was received by the Illinois EPA on August 31, 2015. Please forward it to the EPA Wedron team members for their review and let me know if the EPA has any comments.

Thanks,
Jason

Jason Donnelly

Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

Illinois Environmental Protection Agency

Phone: (217) 557-8764

Fax: (217) 524-4193

Kamke, Sherry

From: Kamke, Sherry
Sent: Wednesday, September 23, 2015 4:04 PM
To: Clark, Jacqueline
Subject: RE: USEPA Comments to Wedron Site Investigation Report

Did Bob comment on this? He is out of the office until next week doing tribal LUST work at Lac du Flambeau.

From: Clark, Jacqueline
Sent: Wednesday, September 23, 2015 3:39 PM
To: Egan, Robert; Kamke, Sherry; Cisneros, Arturo; Shoven, Heather; Poy, Thomas; Kenney, Thomas; Rudloff, Gregory; Guy, Jeff; Kuhlman, Eric; Samanic, Claudine; Bussey, Donald
Cc: Faryan, Steve; Graczyk, Lisa
Subject: FW: USEPA Comments to Wedron Site Investigation Report

Hi Team – Please reply to me and Steve with comments you have on IR's proposed response to EPA's comments by Friday, September 25th. I think Steve has only received feedback from one team member so far. Pay close attention to the maps. Thanks-Jacquie

From: Faryan, Steve
Sent: Tuesday, August 18, 2015 2:24 PM
To: Cisneros, Arturo; Egan, Robert; Kamke, Sherry; Rudloff, Gregory; Samanic, Claudine; Jeffrey J. Guy (Jeff.Guy@illinois.gov); Kuhlman, Eric; Graczyk, Lisa
Cc: Clark, Jacqueline; Kenney, Thomas
Subject: FW: USEPA Comments to Wedron Site Investigation Report

Attached is Illinois RR response to USEPA and IEPA comments and to document the phone conversation that USEPA and IEPA had with Illinois RR and CDM Smith. Please let me know if you have any concerns or additions on this response letter and then we will have the site investigation report finalized by Illinois RR.

Steve Faryan

From: Albrecht, Chris (<mailto:AlbrechtCA@cdmsmith.com>)
Sent: Tuesday, August 18, 2015 11:13 AM
To: Faryan, Steve
Cc: Ken Rose (kruse@omnitrax.com)
Subject: FW: USEPA Comments to Wedron Site Investigation Report

Steve – attached is the document as previously submitted for your review. I am out this week, but can be reached by cell if you have any questions. [REDACTED]

thanks

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com

From: Albrecht, Chris
Sent: Thursday, July 30, 2015 4:50 PM

To: 'Faryan, Steve' <faryan.steven@epa.gov>

Cc: Ken Rose (krose@omnitrax.com) <krose@omnitrax.com>; David L. Rieser (DRieser@muchshelist.com) <DRieser@muchshelist.com>; 'Andy Engeman' (AEngeman@omnitrax.com) <AEngeman@omnitrax.com>; Sandra Remy (sremy@omnitrax.com) <sremy@omnitrax.com>; Smith, Randall T. <SmithRT@cdmsmith.com>

Subject: RE: USEPA Comments to Wedron Site Investigation Report

Steve – attached are responses to the US EPA comments dated June 18, 2015 and based on our recent conference call with US EPA on July 28, 2015. Please do not hesitate to call if you have any questions.

Thank you

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com


From: Faryan, Steve [<mailto:faryan.steven@epa.gov>]

Sent: Thursday, June 18, 2015 3:50 PM

To: Ken Rose (krose@omnitrax.com) (krose@omnitrax.com) <krose@omnitrax.com>; Albrecht, Chris <AlbrechtCA@cdmsmith.com>

Subject: USEPA Comments to Wedron Site Investigation Report

Ken,
Attached are comments on the Site Investigation Report submitted by Illinois RR. I will be out of the office until July 6, so if you want to schedule a meeting or call when I get back please contact Jacque Clark.

Steve Faryan
On-Scene Coordinator
Emergency Response Branch
US EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60605
O: 312-353-9351


Kamke, Sherry

From: Faryan, Steve
Sent: Friday, February 13, 2015 12:10 PM
To: Bussey, Donald; Graczyk, Lisa; Egan, Robert; Cisneros, Arturo; Rudloff, Gregory; Richardson, John; Jim Salch (Jim.Salch@illinois.gov); Kuhlman, Eric; Kamke, Sherry; Albarracin, Hernando
Cc: Kenney, Thomas
Subject: FW: Wedron soils near removed UST #2 figure and hitboxes
Attachments: Figure2_20150213.pdf; F10_Soil_M2GW_Exceeds_rev_ND.pdf; F10_Soil_M2GW_Exceeds_rev_ND2.pdf

Illinois RR and their contractor CDM Smith have sent us a revised figure (figure 2) with proposed locations for the next step out sampling event. These locations are different from the first proposed locations and were changed on their behalf not from our comments. Please review and provide any comments you have by COB Tuesday Feb 17, 2015.

Illinois Railway and their contractor CDM Smith are telling me that they have been in discussion with IEPA regarding the UST #2 investigation and any further action on the property. Please let me know if this is the case and you are satisfied with these borings and any other work they have agreed to do with IEPA.

Thanks,

Steve Faryan, USEPA
312-353-9351

From: Albrecht, Chris [mailto:AlbrechtCA@cdmsmith.com]
Sent: Friday, February 13, 2015 11:49 AM
To: Faryan, Steve
Cc: Ken Rose (krose@omnitrax.com) (krose@omnitrax.com); Smith, Randall T.
Subject: RE: Wedron soils near removed UST #2 figure and hitboxes

Steve – after discussions with Ken and Randy, we have decided to eliminate the step-out boring protocols and just add two additional borings (GP-17 and GP-18) to the south end, just north of the railroad crossing (see attached Figure). GP-20 and GP-21 are in place to see the extent of contamination to the east. We would not complete additional step-out borings in this area, as we already have GP-15 in place to the south and a “clean” boring on the Wedron property to the north (as indicated in the attached Weston Figures 1A and 1B).

I am in all day if you want to discuss further.

thanks

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com

From: Faryan, Steve [mailto:faryan.steven@epa.gov]
Sent: Thursday, February 12, 2015 8:26 AM
To: Albrecht, Chris
Cc: Ken Rose (krose@omnitrax.com) (krose@omnitrax.com)
Subject: RE: Wedron soils near removed UST #2 figure and hitboxes

Chris,

I am good with all the recommendations except I not want to change the PID reading of 5 ppm. I would be willing to talk about sample from the core from a boring that has a higher VOC concentration than say a core that was screened at 5 ppm. The reason for this is that the cold can play a big part in the the volatization of the sample when we are screening in the field. Warming the samples to around 70 degrees prior to screening has always been the most important SOP in the field during the cold.

So I am good with adding this to the sample work plan and then let's get the schedule moving forward.

Thanks,

Steve Faryan, USEPA
312-353-9351

From: Albrecht, Chris [<mailto:AlbrechtCA@cdmsmith.com>]
Sent: Wednesday, February 11, 2015 3:03 PM
To: Faryan, Steve
Cc: Ken Rose (kruse@omnitrax.com); Smith, Randall T.
Subject: FW: Wedron soils near removed UST #2 figure and hitboxes

Steve – I have the following response to comments:

1. During our phone conference, I remember CDM saying that they would follow the approved QAPP. However, I do not see that stated in the letter Scope of Work. I will add a reference to the QAPP.
2. Under Task 2, Phase 1, the last sentence in the first paragraph states that step out borings may be completed based on field observation results, but gives no explanation for what type of results will determine the need for the additional borings. Regarding the step-out borings, I believe almost every boring we have completed had a PID reading of 5 ppm or greater. I would suggest something around 50 ppm. At the end, we still will have the actual results to review. We will also look at visual indicators such as the stained area that has been present in the smear zone.

One additional comment:

I just have one comment on the soil boring locations. The proposed boring in the SE corner appears to be close to a previous boring installed by Wedron Silica, GP14 on 5/8/14 (see attached pdf F10). Although the proposed boring does appear to be slightly south of GP14, I would just confirm with CDM Smith that it is at 10 or more feet south of GP14. The SE boring is meant to be approximately 100 feet south of GP-14.

Steve – are we good regarding the area around UST #2? Eric Kuhlman with IEPA had requested the additional figure and data table emphasizing that area.

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com

From: Faryan, Steve [<mailto:faryan.steven@epa.gov>]
Sent: Tuesday, February 10, 2015 4:28 PM
To: Albrecht, Chris
Cc: Ken Rose (kruse@omnitrax.com) (kruse@omnitrax.com)
Subject: FW: Wedron soils near removed UST #2 figure and hitboxes

Chris,

Here are the USEPA comments on the propose sampling and sampling locations on the Illinois RR property

1. During our phone conference, I remember CDM saying that they would follow the approved QAPP. However, I do not see that stated in the letter Scope of Work.
2. Under Task 2, Phase 1, the last sentence in the first paragraph states that step out borings may be completed based on field observation results, but gives no explanation for what type of results will determine the need for the additional borings.

One additional comment:

I just have one comment on the soil boring locations. The proposed boring in the SE corner appears to be close to a previous boring installed by Wedron Silica, GP14 on 5/8/14 (see attached pdf F10). Although the proposed boring does appear to be slightly south of GP14, I would just confirm with CDM Smith that it is at 10 or more feet south of GP14.

Let me know if you have any questions.

Steve Faryan, USEPA
312-353-9351

Egan, Robert

From: Egan, Robert
Sent: Tuesday, February 10, 2015 12:53 PM
To: Faryan, Steve; Cisneros, Arturo; Lisa Graczyk; Rudloff, Gregory; Bussey, Donald
Cc: Kenney, Thomas; Kamke, Sherry
Subject: RE: Wedron soils near removed UST #2 figure and hitboxes

Steve,

Just two comments-

1. During our phone conference, I remember CDM saying that they would follow the approved QAPP. However, I do not see that stated in the letter Scope of Work.
2. Under Task 2, Phase 1, the last sentence in the first paragraph states that step out borings may be completed based on field observation results, but gives no explanation for what type of results will determine the need for the additional borings.

Please let me know if you have any questions about the comments.

Bob

Bob Egan
Corrective Action Manager
Underground Storage Tanks Section
RCRA Branch
(312) 886-6212
(312) 692-2911 (fax)

From: Faryan, Steve
Sent: Friday, February 06, 2015 10:02 AM
To: Egan, Robert; Cisneros, Arturo; Lisa Graczyk; Rudloff, Gregory; Bussey, Donald
Cc: Kenney, Thomas; Kamke, Sherry
Subject: FW: Wedron soils near removed UST #2 figure and hitboxes

Ok,
Attached is the Statement of Work to go with the figures I just sent you. We can comment on the SOW and locations all at once next week. If you all can get me comments by next Tuesday February 10, 2015.

Thanks

Steve Faryan

From: Albrecht, Chris [<mailto:AlbrechtCA@cdmsmith.com>]
Sent: Friday, February 06, 2015 9:48 AM
To: Faryan, Steve; Eric.Kuhlman@Illinois.gov; Albarracin, Hernando; john.richardson@illinois.gov; Bussey, Donald
Cc: Ken Rose (krose@omnitrax.com); Smith, Randall T.
Subject: RE: Wedron soils near removed UST #2 figure and hitboxes

Steve – attached is the DRAFT work plan/SOW for the additional soil borings for your review. Please let me know if you need anything else.

Thank you

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com

From: Albrecht, Chris

Sent: Friday, February 06, 2015 9:20 AM

To: ' (faryan.steven@epa.gov)'; 'Eric.Kuhlman@Illinois.gov'; 'Albarracin, Hernando'; john.richardson@illinois.gov; 'Bussey, Donald'

Cc: Ken Rose (krose@omnitrax.com); Smith, Randall T.

Subject: FW: Wedron soils near removed UST #2 figure and hitboxes

Steve – attached is the proposed figure and table as requested by the IEPA-LUST Section for the area surrounding UST #2. Please take a look and let me know if you have any comments.

I can forward our draft work plan as well, but it is based on the four proposed step out borings (see Figure 2). I want to make sure we are in agreement with the boring locations as provided.

If this needs to go to others within the agencies, please forward.

Thank you

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com

Kamke, Sherry

From: Lisa Graczyk <LGraczyk@css-dynamac.com>
Sent: Tuesday, February 10, 2015 10:42 AM
To: Faryan, Steve
Cc: Kenney, Thomas; Kamke, Sherry; Cisneros, Arturo; Egan, Robert; Bussey, Donald; Rudloff, Gregory
Subject: RE: Wedron soils near removed UST #2 figure and hitboxes
Attachments: Figure2_20150127.pdf; F10_Soil_M2GW_Exceeds_rev_ND2.pdf

Steve,

I just have one comment on the soil boring locations. The proposed boring in the SE corner appears to be close to a previous boring installed by Wedron Silica, GP14 on 5/8/14 (see attached pdf F10). Although the proposed boring does appear to be slightly south of GP14, I would just confirm with CDM Smith that it is at 10 or more feet south of GP14.

Lisa

Lisa Graczyk
Project Manager/Chemist
405 N. Wabash, Suite 1101
Chicago, IL 60611
312.305.6745 C



CSS-Dynamac

Scientific Minds. Common Sense Solutions.

From: Faryan, Steve [mailto:faryan.steven@epa.gov]
Sent: Friday, February 06, 2015 9:55 AM
To: Cisneros, Arturo; Egan, Robert; Rudloff, Gregory; Lisa Graczyk; Bussey, Donald
Cc: Kenney, Thomas; Kamke, Sherry
Subject: FW: Wedron soils near removed UST #2 figure and hitboxes

Attached are the figures of the proposed soil boring locations at Illinois RR. Please take a look and let me know if you agree with the 4 proposed step out locations today if possible. Sorry for the quick turn around but we need to approve of these locations and then they will send the work plan for our review.

Thanks,

Steve Faryan,

From: Albrecht, Chris [mailto:AlbrechtCA@cdmsmith.com]
Sent: Friday, February 06, 2015 9:20 AM
To: Faryan, Steve; Eric.Kuhlman@Illinois.gov; Albarracin, Hernando; john.richardson@illinois.gov; Bussey, Donald
Cc: Ken Rose (krose@omnitrax.com); Smith, Randall T.
Subject: FW: Wedron soils near removed UST #2 figure and hitboxes

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If this needs to go to others within the agencies, please forward.

Thank you

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com

Kamke, Sherry

From: Faryan, Steve
Sent: Friday, February 06, 2015 9:55 AM
To: Cisneros, Arturo; Egan, Robert; Rudloff, Gregory; Lisa Graczyk; Bussey, Donald
Cc: Kenney, Thomas; Kamke, Sherry
Subject: FW: Wedron soils near removed UST #2 figure and hitboxes
Attachments: Wedron UST#2_soilsTACOTier1.pdf; Figure2_20150127.pdf

Attached are the figures of the proposed soil boring locations at Illinois RR. Please take a look and let me know if you agree with the 4 proposed step out locations today if possible. Sorry for the quick turn around but we need to approve of these locations and then they will send the work plan for our review.

Thanks,

Steve Faryan,

From: Albrecht, Chris [mailto:AlbrechtCA@cdmsmith.com]
Sent: Friday, February 06, 2015 9:20 AM
To: Faryan, Steve; Eric.Kuhlman@Illinois.gov; Albarracin, Hernando; john.richardson@illinois.gov; Bussey, Donald
Cc: Ken Rose (krose@omnitrax.com); Smith, Randall T.
Subject: FW: Wedron soils near removed UST #2 figure and hitboxes

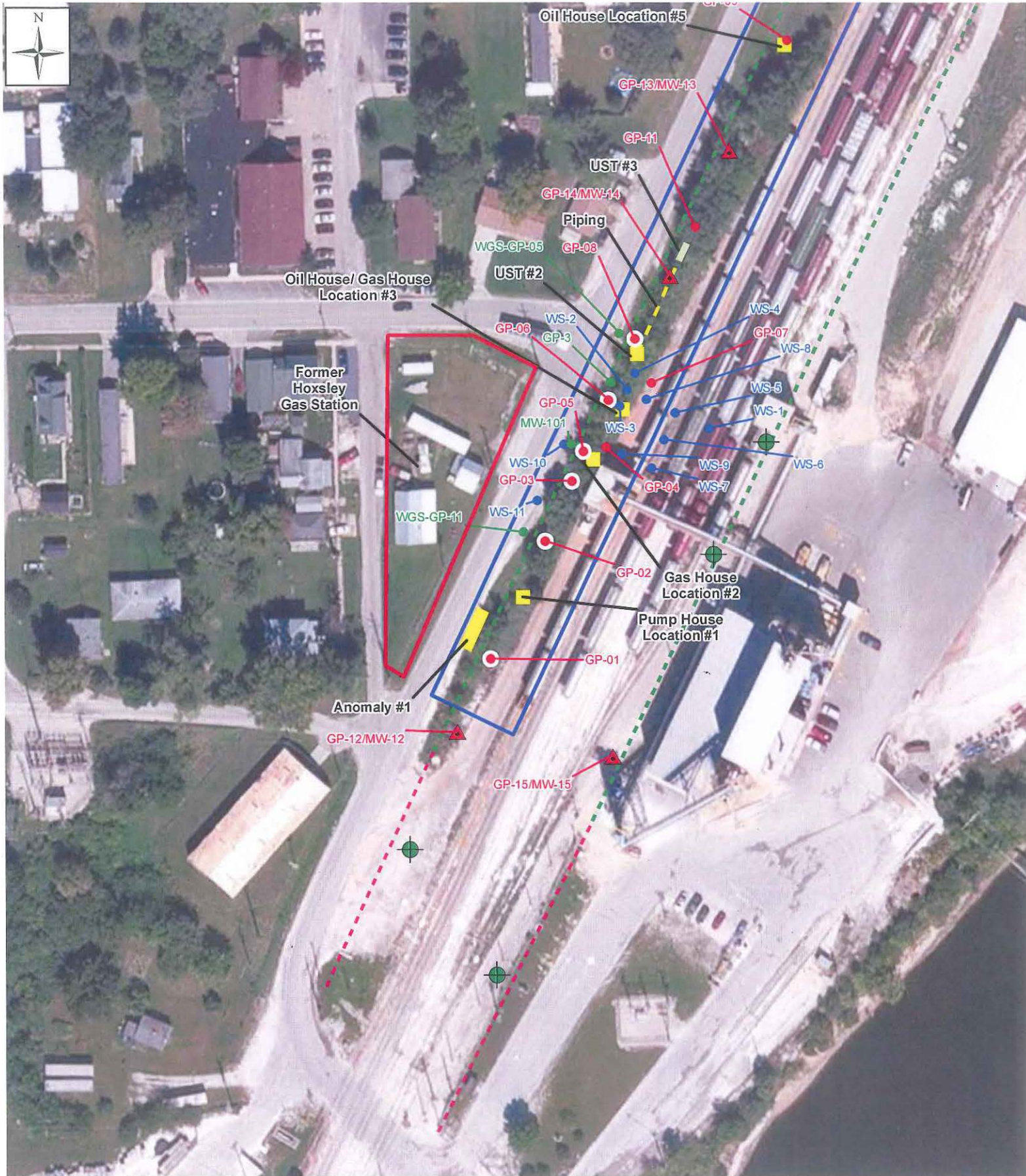
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If this needs to go to others within the agencies, please forward.

Thank you

Christopher A. Albrecht | Sr. Project Manager | CDM Smith | 125 S. Wacker Drive - Suite 600 | Chicago, IL 60606 | T: 312.780.7743 | www.cdmsmith.com



**CDM
Smith**

0 25 50 100
Feet

- | | |
|--|-------------------------------------|
| ● Existing Boring (WGS-GP-05) | ■ Historical Structures |
| ● CDM Smith 2012 Boring (WS-01) | --- Property Boundary |
| ● CDM Smith 2013/14 Boring (GP-01) | - - - Approximate Property Boundary |
| ▲ CDM Smith 2014 Monitoring Well | □ Geophysical Area |
| ● Proposed CDM Smith 2015 Stepout Boring | |

Figure 2
Sample Location Map
Illinois Railway Property
Wedron, IL

LEGEND:

- GP-11 ● WESTON 2012 BORINGS
- GP-3 ● GZA 2012 BORINGS
- WS-10 ⊕ CDM Smith 2012 GEOPROBE BORINGS
- GP-01 ⊕ CDM Smith 2013 GEOPROBE BORINGS
- MW-101 ⊕ EXISTING MONITORING WELL
- IR PROPERTY BOUNDARY
- ||||| RAILROAD TRACKS
- 346601 RD STREET BOUNDARIES

NOTE:

SAMPLING LOCATIONS HIGHLIGHTED RED INDICATE AT LEAST ONE ANALYTICAL RESULT DETECTED AT CONCENTRATION GREATER THAN MOST STRINGENT TACO TIER 1 SOIL REMEDIATION OBJECTIVES. SEE TABLE FOR DETAILS.

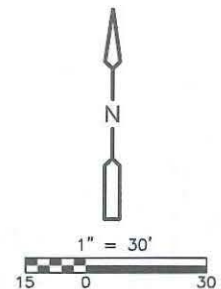
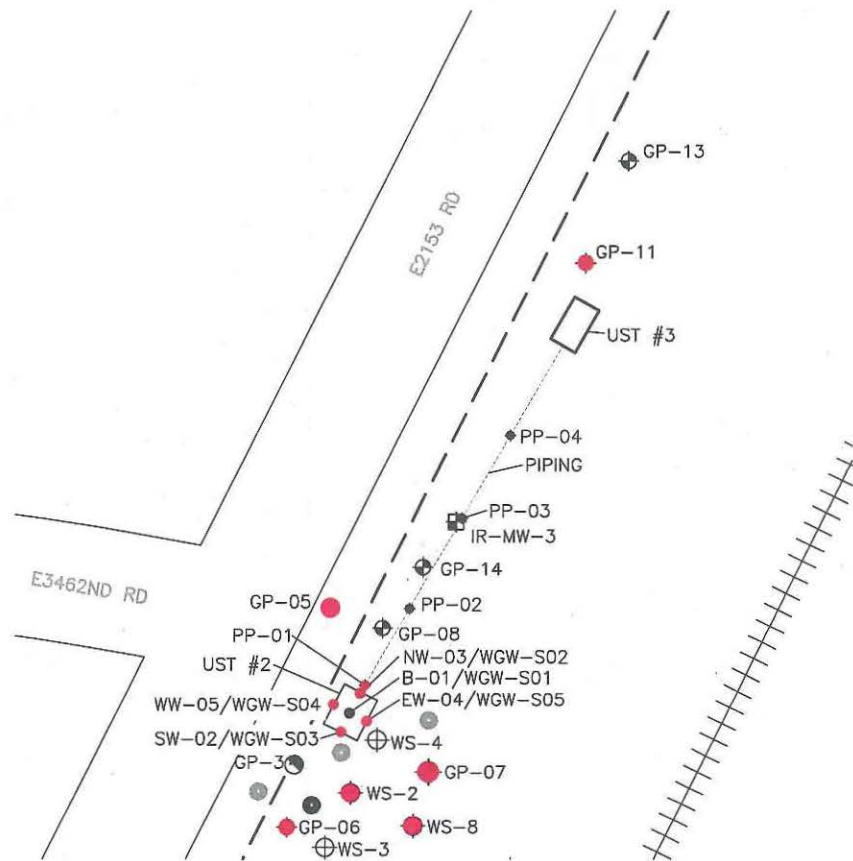


FIGURE 1
 UST #2
 ILLINOIS RAILWAY
 WEDRON, IL

CDM Smith, Weston or other
consultant samples

Additional CDM Smith samples (splits)
with different analytical results.

WGS-GP05 07/26/12			
Depth	Parameter	Result	[Criteria]
2.5-2.5	Benzene	770 J	[30]
2.5-2.5	Ethylbenzene	30000	[13000]
2.5-2.5	Xylene (Total)	280000	[150000]
11-11	Benzene	8800 U	[30]

IR-WS-2 08/23/12			
Depth	Parameter	Result	[Criteria]
11-12	Ethylbenzene	75000	[13000]
11-12	Xylene (Total)	230000	[150000]
11-12	Benzene	100 U	[30]

IR-GP-06 12/19/13			
Depth	Parameter	Result	[Criteria]
18-20	Benzene	130 U	[30]
18-20	Benzene	130 U	[30]

IR-GP-07 12/20/13			
Depth	Parameter	Result	[Criteria]
4-6	Benzene	1600 U	[30]
8-10	Benzene	1500 U	[30]

IR-GP-11 12/20/13			
Depth	Parameter	Result	[Criteria]
17-19	Ethylbenzene	160000	[13000]
17-19	Toluene	39000	[12000]
17-19	Xylene (Total)	940000	[150000]
17-19	Xylene (Total)	310000	[150000]
17-19	Benzene	140 U	[30]

IR-WS-8 08/24/12			
Depth	Parameter	Result	[Criteria]
10.5-10.5	Benzene	110 U	[30]
19-19	Benzene	58	[30]

PP-01 12/12/13			
Depth	Parameter	Result	[Criteria]
3'	Benzene	490	[30]

GB-11B			
Depth	Parameter	Result	[Criteria]
17-19	Ethylbenzene	160000	[13000]
17-19	Toluene	39000	[12000]
17-19	Xylene (Total)	940000	[150000]
17-19	Naphthalene	16000	[1800]
17-19	Benzene	29	[30]

WS-8 08/24/12			
Depth	Parameter	Result	[Criteria]
8-10	Benzene	4.7 U	[30]
13-15	Benzene	12 U	[30]

UST #2

Weston Side Wall Samples

south wall

WGW-S03 04/29/13			
Depth	Parameter	Result	[Criteria]
0-0	Benzene	30 U	[30]

west wall

WGW-S04 04/29/13			
Depth	Parameter	Result	[Criteria]
3-3	Benzene	2800 J	[30]
3-3	Ethylbenzene	47000	[13000]
3-3	Xylene (Total)	210000	[150000]

north wall

WGW-S02 05/16/13			
Depth	Parameter	Result	[Criteria]
3-3	Benzene	330 J	[30]
7-7	Benzene	1000 J	[30]

east wall

WGW-S05 04/29/13			
Depth	Parameter	Result	[Criteria]
3-3	Benzene	1100 U	[30]
5-5	Benzene	7400 U	[30]
5-5	Ethylbenzene	42000	[13000]
5-5	Xylene (Total)	240000	[150000]

CDM Smith Side Wall Samples

SW-02 04/29/13			
Depth	Parameter	Result	[Criteria]
3	Benzene	6.1 U	[30]

WW-05 04/29/13			
Depth	Parameter	Result	[Criteria]
3	Benzene	890	[30]
	Ethylbenzene	17000	[13000]
	Xylene (Total)	100000	[150000]
	Naphthalene	2000	[1800]

NW-03 04/29/13			
Depth	Parameter	Result	[Criteria]
3	Benzene	19 U	[30]

EW-04 04/29/13			
Depth	Parameter	Result	[Criteria]
3	Benzene	17	[30]

Hit boxes presented for parameters with analytical results that exceed the most stringent TACO Tier 1 Remediation Objective

All results are expressed in µg/kg.

Black font denotes analytical result concentration exceeds most stringent TACO Tier 1 Remediation Objective

Green and red fonts indicates analytical result from CDM Smith split sample is significantly different than that collected by Weston.

Where, red indicates exceedance and green indicates results concentration is below remediation objective



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February 5, 2015

DRAFT

Mr. Ken Rose, PE, PG
Director of Engineering & Environmental Services
Illinois Railway, LLC
252 Clayton Street, 3rd Floor
Denver, CO 80206

Subject: Additional Phase II Environmental Site Assessment Scope of Work
Wedron, IL

Dear Mr. Rose:

CDM Smith Inc. (CDM Smith) is pleased to submit this additional scope of work (SOW) to Illinois Railway, LLC (IR) to conduct an additional subsurface investigation on the railroad right-of-way located in Wedron, Illinois. The SOW was developed based on discussion with CDM Smith, IR, United States Environmental Protection Agency (USEPA), and Illinois Environmental Protection Agency (IEPA).

Project Background

The subject property is a railroad easement located on the east side of Wedron, Illinois along County Highway 11. CDM Smith completed a Phase II ESA in late 2013 under a voluntary Administrative Order on Consent (AOC) with the USEPA.

Project Approach

CDM Smith will complete the activities under direction from IR in a timely manner and in accordance with the applicable subsections of IEPA, Title 35: Environmental Protection, Subtitle G: Waste Disposal and Chapter I: Pollution Control Board, Subchapter D: Underground Injection Control and Underground Storage Tank Programs. The activities will also generally follow the AOC requirements. The laboratory procedures and methods will be in accordance with TACO: 35 IAC Part 742 and Part 734 of Subchapter D, Petroleum Underground Storage Tanks, specifically Section 734.415 regarding Data Quality.

Scope of Work

The CDM Smith Team will provide all staff, outside professionals, equipment and supplies to perform the following SOW:

Task 1 – Field Sampling Plan

Sampling Plan - CDM Smith reviewed the 2013-14 CDM Smith Site Investigation Report, data collected during the UST removals, and the data provided by the USEPA and IEPA to develop a field sampling plan (FSP). Boring locations were located based on the historical features





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identified in previous documentation and investigations. Anticipated boring locations are as follows and are shown on Figure 1:

- North of conveyor belt (1 boring)
- South of conveyor belt (1 boring)
- South of scale house and MW-15 (1 boring)
- South of MW-12 (1 boring)

The soils will be screened with an UltraRAE photoionization detector (PID) or equivalent for VOCs. Additional borings will be stepped out approximately 50 feet based on field observations, with the collection of additional samples in order to delineate potential impacts.

CDM Smith will work closely with IR and EPA to determine the placement of the four (4) borings identified above and any additional step-out borings. The borings will be utilized to characterize the fill and subsurface materials and help delineate the presence or absence of gasoline-related constituents on the Site.

Update Site Health & Safety plan – The existing site Health and Safety Plan (HASP), consistent with 29 CFR 1910, describes the methods to be employed to protect the health and safety of personnel involved in field investigation activities. The HASP will be updated as necessary in order to safeguard CDM Smith employees and others present at the site during intrusive site work.

Task 2 – Field Investigation

Utility location - Public utilities will be notified using the Illinois Joint Utility Locating Information for Excavators (JULIE) utility locating services 48 hours prior to drilling.

Phase 1 - Drill and collect samples from soil borings – Following approval of the work plan and boring locations by the USEPA, CDM Smith will direct the drilling subcontractor, CS Drilling, to advance an initial four (4) soil borings using direct push technology to bedrock. Additional step out borings may be completed based on the field observation results.

An engineer/geologist will classify soils according to the Unified Soil Classification System (USCS), note visual evidence of contamination and/or odors, and screen soils with a PID for VOCs. Soils will be classified on a continuous basis from each bore hole from the surface to the terminus of the boring.

Two (2) soil samples from each boring location will be collected for analysis. The samples will be collected based on the PID readings. If there are no elevated PID readings, then one (1) sample will be collected from 0-3 feet bgs and the other from the bottom of the boring just above the water table. If there is only a single PID reading, then one (1) sample will be collected from the



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soil depth associated with the PID reading and the other from the bottom of the boring just above the water table. No soil samples will be collected below the water table. Quality control samples will be collected in the field, including field duplicates, trip blanks, and matrix spike/matrix spike duplicates (MS/MSD).

The soil and groundwater samples selected for analytical testing will be placed in the appropriate containers provided by the laboratory, logged, properly labeled, placed in iced coolers, and sent to the analytical laboratory using standard chain-of-custody procedures.

Analytical – CDM Smith will analyze soil samples for benzene, ethylbenzene, toluene, and xylenes (BTEX), polynuclear aromatic hydrocarbons (PNAs), total lead, and pH. Toxicity Characteristic Leaching Procedure (TCLP) lead can be conducted, dependent on the initial findings.

Laboratory analytical services will be provided by Test America of University Park, Illinois. Test America is accredited by the National Environmental Laboratory Accreditation Program (NELAP). Laboratory procedures and methods will meet the minimum specified detection limits in accordance with the IEPA TACO: 35 IAC Part 742 and/or SW-846 protocols. CDM Smith assumes samples will be analyzed under a standard (10-day) turnaround time.

Decontamination and Investigation-Derived Waste - Decontamination of the drill rig will be conducted between borings. An Alconox solution will be used on all other sampling equipment. Investigation-derived waste (IDW) such as soil cuttings and decontamination water will be drummed and left onsite at a location approved by IR and/or Wedron Silica.

Field Assumptions

- CDM Smith assumes that all work will be conducted within the IR property limits; therefore, no local permits will be required and site access will be available at all times.
- The field investigation plan is based on two (2), 10-hour workdays and one mobilization. CDM Smith will complete as much work as possible within that time frame; however, due to weather, accessibility, and/or site conditions, it is possible that additional field time may be required to complete the work scope.
- Field personnel and drilling subcontractors will be able to access all required portions of the site. All proposed borings and monitoring well locations will be accessible to a truck-mounted drill rig. Inaccessible locations will be evaluated to determine alternative safe drilling and access options.
- CDM Smith will attempt to locate the proposed borings in readily accessible areas.
- Borings will be completed to the bedrock.



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EPA Access

EPA will be allowed access to the soil borings for sampling purposes as needed, subject to the terms of the AOC regarding compliance with railroad operations and safety, and use of appropriate personal protective equipment.

Task 3 – Report

CDM Smith will update the existing Site Investigation Report for the additional subsurface investigation, including the following:

- Documentation of field activities including field procedures, sample preservation and handling methods, and boring logs
- A figure showing all boring/sampling locations and depths in relation to the site recognized environmental conditions
- A table comparing detected chemicals to proposed TACO Tier 1 remediation objectives (ROs) contained in 35 IAC Part 742
- A figure showing the locations where contaminants were detected above the ROs
- Laboratory results and reports
- Boring logs with PID data

Deliverables

Three hard copies and an electronic copy in .pdf format to IR.

Project Schedule

January 29, 2015 – USEPA call

February 6, 2015 – Submit schedule and workplan revision to USEPA

February 13, 2015 – USEPA approval of schedule and workplan

February 27, 2015 – Survey IR boundaries, new borings

March 6, 2015 – Complete field sampling (up to 2 days), samples to lab

March 20, 2015 – Receive draft analytical results from lab

April 3, 2015 – Submit analytical results to USEPA

April 6, 2015 – USEPA Public Meeting



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Please contact the undersigned with any questions or comments.

Very truly yours,

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